

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**DECAPOLIS SYSTEMS, LLC,**

**Plaintiff,**

**v.**

**CERNER CORPORATION,**

**Defendant.**

**Case No. 6:21-cv-00496-ADA**

**JURY TRIAL DEMANDED**

**CERNER CORPORATION’S FIRST SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO PLAINTIFF’S FIRST VENUE-RELATED SET OF  
INTERROGATORIES (SUPPLEMENTING RESPONSE TO INTERROGATORY NO. 2)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Court’s Rules and Orders, Defendant Cerner Corporation (“Cerner”) hereby provides its First Supplemental Objections and Responses to Plaintiff Decapolis Systems, LLC’s (“Decapolis” or “Plaintiff”) First Venue-Related Interrogatories (Nos. 1-5). In particular, Cerner hereby supplements its Response to Interrogatory No. 2.

**GENERAL OBJECTIONS**

The following General Objections apply to all of Cerner’s Responses. If Cerner specifically refers to a General Objection in a Response, all other General Objections still apply to that Response and are not waived.

A. Cerner objects to Plaintiff’s Interrogatories to the extent the Interrogatories seek information beyond that presently available to Cerner after a reasonable investigation. Cerner has not completed its discovery, investigation, research, and/or trial preparation. The following responses are based solely on the information that is presently available and specifically known to

Cerner. The following responses are given without prejudice to Cerner's right to produce evidence of any subsequently-discovered information. Cerner reserves the right to amend any and all responses herein as additional information is ascertained. Cerner's objections as set forth herein are made without prejudice to Cerner's right to assert any additional or supplemental objections should Cerner discover additional grounds for such objections.

B. Cerner objects to Plaintiff's Interrogatories to the extent the Interrogatories seek information that is protected by the attorney-client privilege, work-product immunity, or any other applicable protection from discovery. It shall be understood that inadvertent disclosure of communications protected by any privilege shall not constitute a waiver of the applicable privilege, either as to those communications inadvertently revealed, or as to any other communications.

C. Cerner objects to Plaintiff's Interrogatories' definitions and instructions to the extent they are broader than, or impose conditions, obligations or duties beyond those required by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the local rules, and/or other applicable law.

D. Cerner objects to Plaintiff's Interrogatories to the extent they seek information that is not reasonably calculated to lead to the discovery of admissible evidence. By responding to an Interrogatory, Cerner is not conceding that the Interrogatory is relevant to the subject matter of this litigation or reasonably calculated to lead to the discovery of admissible evidence. Likewise, Cerner objects to Plaintiff's Requests to the extent they seek information regarding alleged acts of infringement by or performed on behalf of the federal government. *See* 28 USC §1498. Cerner expressly reserves the right to object to further discovery into the subject matter of these Interrogatories and to the introduction of these Interrogatories into evidence. Cerner also expressly reserves the right to challenge the authenticity, relevance, materiality, privilege, or admissibility

of the information provided in the documents identified and/or produced in response to these Interrogatories at any subsequent proceeding or trial.

E. Cerner objects to the Plaintiff's Interrogatories to the extent the Interrogatories seek trade secrets or other confidential or proprietary, commercial, or business information. Cerner will produce such information, if requested and not otherwise objectionable, under the terms of the Protective Order entered in this case, when such an Order is entered by the Court. Until such an Order is entered, Cerner will, to the extent reasonable, produce information as "Attorneys' Eyes Only" pursuant to Exhibit H-2 of the Local Rules of the Western District of Texas, which specifically limits disclosure of such information to "retained counsel for the parties in this litigation and their respective staff", as well as Judge Albright's June 24, 2021 Standing Order entitled "Order Governing Proceedings - Patent Cases," which indicates that prior to the entry of a Protective Order, an interim Protective Order will govern the disclosure of confidential information in this matter, wherein disclosures of documents or information marked with a confidentiality designation "shall be limited to each party's outside attorney(s) of record and the employees of such outside attorney(s)."

F. Cerner objects to Plaintiff's Interrogatories to the extent the Interrogatories seek information that is already in Plaintiff's possession, is publicly available, and/or is otherwise equally accessible to Plaintiff.

G. Cerner objects to Plaintiff's Interrogatories to the extent the Interrogatories seek information from or related to a time period beyond that relevant to the determination of the propriety of venue the present action.

H. Cerner objects to Plaintiff's Interrogatories to the extent a response would be unduly burdensome and expensive, taking into account the needs of the case, and its importance to the relevant issues.

I. The lack of a specific objection by Cerner to a particular, individual Interrogatory shall not be construed as an admission that responsive information exists.

J. Cerner objects to Plaintiff's Instructions as overly broad, unduly burdensome, and calling for information neither relevant nor reasonably calculated to lead to the discovery of relevant information, to the extent they request that Cerner "Identify each and every person who participated in supplying information and/or drafting your response or any part thereof."

K. Cerner objects to Plaintiff's Instructions as overly broad, unduly burdensome, and calling for information neither relevant nor reasonably calculated to lead to the discovery of relevant information, to the extent they request that "If the answer to any of these Interrogatories was made by referring to or reviewing any documents, identify each and every document referred to or reviewed and the Interrogatory or Interrogatories in connection with which they were used"

L. Cerner objects to Plaintiff's Instructions, Definitions, and Interrogatories to the extent they request "any" or "all" facts, documents, persons, things, etc. as overly broad and unduly burdensome as such an instruction, literally interpreted, is impossible to comply with and not reasonably calculated to lead to the discovery of admissible evidence.

M. Cerner objects to Plaintiff's Instructions, Definitions, and Interrogatories as overly broad and unduly burdensome to the extent they seek the identification of "each and every document prepared by, or in the possession, custody, or control of you or any of your officers, agents, or employees that relates to or refers to the subject matter of the Interrogatory in question," as such an instruction, literally interpreted, is impossible to comply with and not reasonably

calculated to lead to the discovery of admissible evidence. Cerner will identify all responsive documents in its possession, custody, or control after conducting a reasonably diligent investigation.

N. Cerner objects to Plaintiff's Instructions, Definitions, and Interrogatories as overly broad and unduly burdensome to the extent they call for Cerner to consult "every source of information ... regardless of whether the source is within [Cerner's] immediate possession or control" and "[a]ll documents or other information in the possession of experts or consultants". Cerner will perform a reasonably diligent investigation and consult sources within its possession, custody, or control.

O. Cerner objects Plaintiff's definition of "You" and "Your" as overly broad, unduly burdensome, and calling for information neither relevant nor reasonably calculated to lead to the discovery of relevant information, to the extent it encompasses "all officers, directors, employees, agents, attorneys, representatives or any other person acting on their behalf or on behalf of any one of them at any time." The responses provided herein are made on behalf of Cerner and not for any other entities or individuals.

P. Cerner objects to Plaintiff's definition of "relating to" as overly broad, unduly burdensome, and not proportional to the needs of the case.

Q. Cerner objects to Plaintiff's definition of "document" as vague and ambiguous to the extent it includes "all other records and papers of any nature whatsoever".

R. Cerner objects to Plaintiff's definition of "Any reference to a specifically named person, corporation or other entity and any reference generally to 'person'" as overly broad, unduly burdensome, and calling for information neither relevant nor reasonably calculated to lead to the

discovery of relevant information, to the extent it encompasses “other persons acting on behalf thereof or through whom the referenced person acts”.

S. Cerner objects to Plaintiff’s definition of “Accused Products” as vague and ambiguous, overly broad, and unduly burdensome to the extent it includes “all products that are reasonably similar in operation and functionality” and places the burden on Cerner to determine which, if any, of its products or solutions are “reasonably similar in operation and functionality” to those specifically identified by Plaintiff. Cerner further objects to the definition as vague and ambiguous, overly broad, and unduly burdensome to the extent it calls for “products, systems, and/or services ... as identified in the operative Complaint, in Plaintiff’s Infringement Contentions, or otherwise noticed in this litigation.” At the time these Interrogatories were served, Plaintiff had not served any Infringement Contentions, and it is unclear what “otherwise noticed” means.

T. Cerner objects to Plaintiff’s definition of “Asserted Patents” to the extent it calls for patents “identified in ... Plaintiff’s Infringement Contentions, or otherwise noticed in this litigation.” At the time these Interrogatories were served, Plaintiff had not served any Infringement Contentions, and it is unclear what “otherwise noticed” means.

Cerner asserts each General Objection above in response to each of the responses and incorporates them into each response as if explicitly stated therein. Subject to, and without waiving, these general objections, Cerner specifically respond as follows:

### **SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES**

#### **VENUE INTERROGATORY NO. 1:**

For each employee that resides in the Western District of Texas, please provide the following:

- (i) the name of each such individual;
- (ii) the city or town in the Western District of Texas in which each such individual currently resides;
- (iii) the length of time in years that each such individual has been employed by You;
- (iv) the job title of each such individual; and

(v) the job description for each such individual.

**ANSWER:**

Cerner incorporates each of the foregoing objections to this response. The following responses are based solely on the information that is presently available and specifically known to Cerner. The following responses are given without prejudice to Cerner's right to produce evidence of any subsequently-discovered facts.

Subject to and without waiving the foregoing objections, Cerner responds as follows:

Cerner has identified each of its employees in the Western District of Texas. This information is provided in a chart attached hereto as Exhibit A.

Cerner expressly reserves the right to supplement, amend, and/or modify this response as its investigation of this matter and collection of discoverable material is on-going.

**VENUE INTERROGATORY NO. 2:**

As of the date of filing of the Original Complaint in this matter, please identify with specificity any and all servers, computers, electronic storage facilities, physical storage facilities, warehouses, hardware, equipment, and/or software which are: (i) located in the Western District of Texas, and (ii) either owned by You, under Your supervision and control, or leased by You.

**ORIGINAL ANSWER – AUGUST 16, 2021:**

Cerner incorporates each of the foregoing objections to this response. Cerner objects to this Interrogatory as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks "any and all servers, computers, electronic storage facilities, physical storage facilities, warehouses, hardware, equipment, and/or software". Cerner objects to this Request because the terms "hardware" and "equipment" are vague and ambiguous and fail to describe with particularity the information being sought. Cerner further objects to this Interrogatory as vague and ambiguous as to the scope and meaning of the

phase “under Your supervision and control”. Cerner understands “under Your supervision and control” to mean managed and maintained by Cerner personnel. Cerner further objects to this Interrogatory as vague and ambiguous to the extent it seeks “software...located in the Western District of Texas”. Cerner understands “software...located in the Western District of Texas” to mean software hosted on and operated from a server or other equipment located in the Western District of Texas. The following responses are based solely on the information that is presently available and specifically known to Cerner. The following responses are given without prejudice to Cerner’s right to produce evidence of any subsequently-discovered facts.

Subject to and without waiving the foregoing objections, Cerner responds as follows:

Cerner is not aware of any servers, electronic storage facilities, physical storage facilities, or warehouses located in the Western District of Texas that are owned, operated, or leased by Cerner. Cerner is not aware of any Cerner-owned software that is hosted on and operated from a server or other equipment located in the Western District of Texas.

Cerner generally provides laptops to each of its employees, including those who reside in and/or work from the Western District of Texas. Accordingly, each of the employees identified in Interrogatory Number 1 likely has a Cerner-owned laptop in their possession to use for work purposes.

Cerner expressly reserves the right to supplement, amend, and/or modify this response as its investigation of this matter and collection of discoverable material is on-going.

#### **FIRST SUPPLEMENTAL ANSWER – SEPTEMBER 24, 2021**

Cerner incorporates its prior general and specific objections into this supplemental Response. Subject to and without waiving those objections, Cerner supplements its original Response to this Interrogatory as follows:



Cerner has identified hardware (including servers, load balancers, routers, and power switches) that is owned by Cerner and located in the Western District of Texas. This information is provided in a chart attached hereto as Exhibit B. Each piece of hardware is located on a Cerner client site, as listed in Exhibit B. This hardware is necessary for the provision of Cerner's Remote Hosting Option (RHO) services, wherein Cerner remotely hosts software and the client's data at data centers located outside the Western District of Texas, and/or for the provision of certain software solutions that require hardware to be in close proximity to the client-site or specific medical devices located thereon.

Such software solutions, which may potentially be running on one or more of the servers listed in Exhibit B, are: 724 Downtime Viewer; CareAware Multi-Media; AX/Document Imaging; SOAD/Socket Adapter; and Fetalink.

WTS Toolkit software is necessary for the provision of Millennium applications via Cerner's Remote Hosting Option services, and thus may also be present on one or more of the servers listed in Exhibit B. Cerner expressly reserves the right to supplement, amend, and/or modify this response as its investigation of this matter and collection of discoverable material is on-going.

**VENUE INTERROGATORY NO. 3:**

As of the date of filing of the Original Complaint in this matter, please identify with specificity each and every individual or entity located in the Western District of Texas with whom You have a contractual relationship to provide goods and/or services to You, on Your behalf, or for Your economic benefit, in the Western District of Texas. By way of example, and not as a limiting definition, responsive information under this Interrogatory would include, for example: (i) independent service contractors, and/or (ii) third party entities such as server hosts and the like who provide electronic equipment (such as servers or electronic storage) used by You in providing services to Your customers.

**ANSWER:**

Cerner incorporates each of the foregoing objections to this response. Cerner objects to this Interrogatory as overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, especially to the extent that it calls for the identification of “each and every individual or entity.” Cerner objects to this Interrogatory as vague and ambiguous to extent it calls for identification of “each and every individual or entity located in the Western District of Texas.” Cerner objects to this Interrogatory as vague and ambiguous to extent it refers to “provid[ing] goods and/or services ... in the Western District of Texas.” Cerner objects to this Interrogatory as vague and ambiguous as the scope of “for Your economic benefit” is not defined, and the phrase fails to describe with particularity the information being sought. The following responses are based solely on the information that is presently available and specifically known to Cerner. The following responses are given without prejudice to Cerner’s right to produce evidence of any subsequently-discovered facts.

Subject to and without waiving the foregoing objections, Cerner responds as follows:

At the present time, Cerner is not aware of any entities located in the Western District of Texas that supply goods to Cerner or on behalf of Cerner to places located within the Western District of Texas.

Cerner expressly reserves the right to supplement, amend, and/or modify this response as its investigation of this matter and collection of discoverable material is on-going.

**VENUE INTERROGATORY NO. 4:**

Identify each employee residing in the Western District of Texas by name, title, residential address, and office address whom You may call at trial in this matter.

**ANSWER:**

Cerner incorporates each of the foregoing objections to this response. The following responses are based solely on the information that is presently available and specifically known to Cerner. The following responses are given without prejudice to Cerner's right to produce evidence of any subsequently-discovered facts.

Subject to and without waiving the foregoing objections, Cerner responds as follows:

At the present time, Cerner is not aware of any employee residing in the Western District of Texas that Cerner may call at trial in this matter.

Cerner expressly reserves the right to supplement, amend, and/or modify this response as its investigation of this matter and collection of discoverable material is on-going.

**VENUE INTERROGATORY NO. 5:**

Identify the manner in which Your employees may access and obtain copies (electronic or paper) of documents relevant to the accused instrumentalities as identified in the Original Complaint in this matter.

**ANSWER:**

Cerner incorporates each of the foregoing objections to this response. Cerner objects to this Interrogatory as overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence. Cerner objects to this Interrogatory as vague and ambiguous because "accused instrumentalities" is undefined. Cerner will interpret "accused instrumentalities" to mean the Accused Products identified in the original Complaint (Dkt. No. 1). Cerner objects to this Interrogatory as vague and ambiguous because the scope of the term "Your employees" is not defined, and potentially refers to any and all Cerner employees, no matter where located, who may have no connection to the subject matter of the present litigation. Cerner objects to this Interrogatory as vague and ambiguous because the scope of "documents relevant to the accused

instrumentalities” is unclear. Cerner will interpret “documents relevant to the accused instrumentalities” to mean documents containing information about the Accused Products that is relevant to the present lawsuit. Cerner objects to this Interrogatory as vague and ambiguous because the meaning and scope of phrase “the manner in which Your employees may access and obtain copies of documents” is unclear. The following responses are based solely on the information that is presently available and specifically known to Cerner. The following responses are given without prejudice to Cerner’s right to produce evidence of any subsequently-discovered facts.

Subject to and without waiving the foregoing objections, Cerner responds as follows:

The vast majority of electronic documents regarding the Accused Products can be found on an internal corporate network hosted in the Kansas City, Missouri area. Information about the Accused Products may also be available via Cerner’s Sharepoint corporate intranet hosted, on Cerner’s behalf, by Microsoft Corporation. These corporate resources are how employees with relevant knowledge of the Accused Products would generally find, access, and obtain such documents. To the extent that any exist, physical documents regarding the Accused Products would generally be located in physical storage in Kansas City, Missouri. Accordingly, an employee would need to physically access that storage space to review or obtain those documents.

Cerner expressly reserves the right to supplement, amend, and/or modify this response as its investigation of this matter and collection of discoverable material is on-going.

Dated: September 24, 2021

/s/ Fiona A. Bell

Robert H. Reckers (TX Bar No. 24039520)

Email: rreckers@shb.com

Fiona A. Bell (TX Bar No. 24052288)

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*Counsel for Defendant*

*Cerner Corporation*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rules, I hereby certify that on the 24th day of September, 2021, I served the foregoing to the following counsel of record via the e-mail addresses shown below:

M. Scott Fuller  
Email: [sfuller@ghiplaw.com](mailto:sfuller@ghiplaw.com)

Rene A. Vazquez  
Email: [rvazquez@ghiplaw.com](mailto:rvazquez@ghiplaw.com)

Randall T. Garteiser  
Email: [rgarteiser@ghiplaw.com](mailto:rgarteiser@ghiplaw.com)

/s/ Fiona A. Bell  
Fiona A. Bell

# Exhibit A

Name	Job Title	Home City	Service (Years)	Job Description
Karl Kiessling	Senior Manager, Client Application Services	Midland	4.78	Provide onsite leadership for associates involved in development, design, and optimization of technical information system platforms for ITWorks clients.
David Booth	Senior System Engineer	Odessa	2.92	Perform daily tasks to verify system integrity and availability, provide onsite leadership for associates, support installation and maintenance of Cerner solutions, and provide Tier III and other support per request
Anusha Donepudi	Software Engineer I	Odessa	2.92	Code, test, and debug new software and make enhancements to existing software
Brad Dummer	Senior System Security Engineer	Midland	2.92	Lead the development of business continuity and disaster recovery plans, process, and procedures, perform system maintenance tasks, and manage security solutions and other Cerner activities
Genoveva Franco	Executive Assistant	Odessa	2.92	Assist with administrative tasks on behalf of executives, including calendar management, preparing a range of routine and non-routine materials for executives, timesheet and expense submission, and travel arrangements
Victor Gonzalez	Senior Asset Specialist	Odessa	2.92	Manage internal or external inquiries, service requests, and escalations, receive and process purchased or returned equipment
Natalie Helms	Project Manager	Odessa	2.92	Facilitate project implementation, support a team, and manage interdependencies or dependencies between projects or programs
Clinton Keene	System Engineer I	Odessa	2.92	Perform daily tasks to verify system integrity and availability, perform ongoing performance tuning, hardware/OS upgrades, and resource optimization, deploy physical and virtual servers, and provide Tier III and other support per request
Cyle Mansell	Delivery Consultant III	Odessa	2.92	Consult with clients on current workflows and configuration, upgrade implications, system changes and enhancements, and ongoing system maintenance
Joe McBride	Senior Solution Architect	Odessa	2.92	Guide clients through current workflows, upgrades, system changes and enhancements and ongoing system maintenance and act as primary consultant for troubleshooting
Rob O'Daniel	Delivery Consultant III	Odessa	2.92	Consult with clients on current workflows and configuration, upgrade implications, system changes and enhancements, and ongoing system maintenance
Clemens Pangan	Senior Integration Architect	Odessa	2.92	Manage client relationships and develop strategies for design, system validation, and integration, and serve as final point of escalation
Beverly Parsons	Senior Solution Architect	Odessa	2.92	Guide clients through current workflows, upgrades, system changes and enhancements and ongoing system maintenance and act as primary consultant for troubleshooting
Clark Peppentenza	Network Engineer II	Odessa	2.92	Design, install, and maintain local area network, wide area network, and wireless network components and maintain hardware components, including firewalls, load balancers, routers, switches and access points
Alex Rayo	Senior System Engineer	Odessa	2.92	Perform daily tasks to verify system integrity and availability, support installation and maintenance of Cerner solutions, layered software, and infrastructure, and provide Tier III and other support per request
Ricardo Ruvalcaba	Support Technician II	Odessa	2.92	Provide routine and non-routine technical support and manage team and personal ticket queues for issues and requests
Russell White	Manager, Client Technology Services	Midland	2.92	Manage team of associates, participate in financial planning and technology and security infrastructure assessments for the client, and manage development and delivery of services and technology to clients
Dwayne Williford	Support Technician II	Odessa	2.92	Provide routine and non-routine technical support and manage team and personal ticket queues for issues and requests
Michael Yandrich	Software Engineer IV	Odessa	2.92	Lead the architecture, development, and maintenance of solutions or platforms, participate in architecture discussions, design sessions and code reviews, and code for projects
Kyle Brown	Project Manager	Odessa	2.91	Facilitate project implementation, support a team, and manage interdependencies or dependencies between projects or programs
Kennzy Smith	Senior Team Lead, End User Support	Midland	2.91	Manage the operations of associates assigned to perform solution-related service request investigation, incident resolution, and application maintenance and manage the creation and maintenance of knowledge databases to support business processes
Michael Kikuchi	Support Technician I	Odessa	2.91	Provide routine technical support and perform specific hardware and software maintenance
Meriani Babatope	Clinical Informaticist I	Odessa	2.09	Evaluate clinical utilization and workflow and provide clinical input during the application system review, design, development, testing and enhancement of information systems



Cesar Payen	Support Technician I	Odessa	2.01	Provide routine technical support and perform specific hardware and software maintenance
Pete Hottenstein	Manager, Portfolio Management	Midland	1.89	Manage team of associates, direct and review team's work, propose quality and process improvement initiatives, and provide input on strategic initiatives at the department-level
William Tennison	Support Technician I	Odessa	1.98	Provide routine technical support and perform specific hardware and software maintenance
Donavon Baeza	Delivery Consultant II	Odessa	1.41	Consult with clients on current workflows and configuration, upgrade implications, system changes and enhancements, and ongoing system maintenance
Christian Lomague	Support Technician I	Odessa	1.24	Provide routine technical support and perform specific hardware and software maintenance
Matt Horstman	Senior Manager, Client Engagement Management	San Antonio	6.00	Manage one or more teams of associates, direct and review team's work, propose quality and process improvement initiatives, and provide input on strategic initiatives at the department-level
Mark Privitera	Director & Upstream Product Marketer	Austin	4.07	Identify and translate market needs into product innovation requirements
Shawna Fugler	Senior Healthcare Executive	Austin	4.25	Provide executive oversight to projects and direct the overall adoption activities and relationship in partnership with the internal and client leadership teams
Jay Giri	Database Administrator I	Killeen	4.14	Install and upgrade database software and implement and maintain database security
Adam Alvarado	Integrated Technologies Owner	San Antonio	4.09	Direct and support a team of associates responsible for delivering the technical aspects of a client implementation project and facilitate status meetings with clients around the technical components of the project
Matthew Ruebel	Director, Client Engagement Management	Austin	19.08	Take appropriate action to prevent and report any compromises of security within scope of position
Lisa Parmelee	Lead Services Sales Lead	Austin	18.60	Consult with prospective or current clients, perform sales work, and participate in contract negotiations
Natalie Riels	Senior Manager, Solution Integration	Austin	17.76	Manage one or more teams of associates, direct and review team's work, propose quality and process improvement initiatives, and provide input on strategic initiatives at the department-level
Eafong Tsien	Senior Manager, Solution Integration	Austin	16.99	Manage one or more teams of associates, direct and review team's work, propose quality and process improvement initiatives, and provide input on strategic initiatives at the department-level
Corey Elledge	Senior Business Operations Analyst	Austin	12.24	Manage operational support processes for a team responsible for delivering business process outcomes including the people, data processes, and financial investments
Mark Jarrell	Senior Manager, Solution Integration	Austin	12.16	Manage one or more teams of associates, direct and review team's work, propose quality and process improvement initiatives, and provide input on strategic initiatives at the department-level
Meagan Grantham	Lead Process Consultant	San Antonio	10.59	Manage large-scale, cross-functional projects to deliver new or significantly change existing solutions, services, or programs
Nick Abrutz	Senior Engagement Owner	Austin	10.55	Manage a team of associates, manage client projects in environments with a high degree of variability, and act as an escalation point for client and project risks
Emily Mayhan	Senior Learning Designer	Austin	8.82	Design and develop content for blended learning and behavior change in a variety of applications and coordinate with team of subject matter experts, multi-media developers, and others to provide effective and engaging instruction that builds motivation and ability
Justin White	Senior Support Services Owner	Austin	8.71	Manage external client relationships with a high degree of variability, develop continuous improvement strategies, and act as the single point of contact for cross-organizational support escalations
Madhura Suresh	Software Engineer III	Austin	7.58	Analyze, design, code, debug, test, and modify new software or enhancements
Cara Campos	Director, Financial Alignment	Austin	7.67	Take appropriate action to prevent and report any compromises of security within scope of position
Jeff Spangler	Senior Integrated Technologies Consultant	San Antonio	7.39	Guide internal and external project teams through technical architecture recommendations in client environments and act as a final point of escalation for technical and deployment issue resolution
Scott McGee	Consultant II	San Antonio	7.31	Consult with clients on comprehensive service line workflows and work with client to map out stop-start-continue processes to determine how the system will be designed and tested
Michael Blake	Delivery Consultant II	El Paso	7.28	Consult with clients on current workflows and configuration, upgrade implications, system changes and enhancements, and ongoing system maintenance
Tracy Parker	Lead Revenue Cycle Architect	San Marcos	6.52	Lead revenue cycle integration, workflow, and technical design for multiple client engagements and manage associate activity
Sherman Darius	Software Engineer IV	Del Rio	6.52	Code for high-risk projects, lead the architecture, development and maintenance of a solution or platform, and provide direction in architecture discussions, design sessions, and code reviews
Curtis Davis	Senior Solution Architect	Austin	6.52	Guide clients through current workflows, upgrades, system changes and enhancements, and ongoing system maintenance

Karen Romans	Lead Solution Architect	Austin	6.52	Guide clients through current workflows, upgrades, system changes and enhancements, and ongoing system maintenance
Samantha Hagy	Consultant III	Austin	6.23	Consult with clients on service line workflow and guide them through interdependencies and design decision impacts
Binyam Tadesse	System Engineer I	Austin	4.81	Perform daily tasks to verify system integrity and availability, perform ongoing performance tuning, hardware/OS upgrades, and resource optimization, deploy physical and virtual servers, and provide Tier III and other support per request
Taylor Leavitt	Consultant III	New Braunfels	5.05	Consult with clients on service line workflow and guide them through interdependencies and design decision impacts
Katrina Anstrom	Consultant III	Austin	4.81	Consult with clients on service line workflow and guide them through interdependencies and design decision impacts
Zacaree Everhart	Consultant I	Austin	3.42	Consult with clients on core service line workflows and work with client to map out stop-start-continue processes to determine how the system will be designed and tested
Daniel Chase	Software Engineer IV	San Antonio	2.28	Lead the architecture, development, and maintenance of solutions or platforms, participate in architecture discussions, design sessions and code reviews, and code for projects that have solution dependencies within and outside current team
Jerry Judson	Integrated Technologies Architect	San Antonio	1.64	Manage integrated technology deployment of hardware, software, and services with solution consulting teams
Kyle Watson	Test Automation Engineer II	San Marcos	1.59	Develop, maintain, and execute automation tests as well as develop and maintain test automation architecture and frameworks
Harsha Modali	Software Engineer I	Austin	1.09	Code, test, and debug new software and make enhancements to existing software
Angela Lee	Lead Sales Executive	Austin	1.42	Plan and execute sales strategies and build and maintain strategic partnerships across client organizations
Shubham Dhyani	Software Engineer I	Austin	0.66	Code, test, and debug new software and make enhancements to existing software
Abhinay Chintalapati	Software Engineer I	Austin	0.54	Code, test, and debug new software and make enhancements to existing software
Ivan Ayala	Lead Federal Information Systems Security Engineer	Austin	0.63	Design and engineer system security solutions and collaborate with internal and external stakeholders to analyze, define, and validate functional and legal/regulatory system security controls and requirements
Madhukar Allu	Software Engineer I	Austin	0.59	Code, test, and debug new software and make enhancements to existing software
BhanuPrakash Muppalla	Software Engineer I	Austin	0.59	Code, test, and debug new software and make enhancements to existing software
Naman Munot	Software Engineer I	Austin	0.59	Code, test, and debug new software and make enhancements to existing software
D'Nita Isaac	Learning Consultant I	El Paso	0.59	Develop learning curriculum, evaluate learning solution effectiveness, and conduct training and coaching
Claudia Mayfield	Federal Learning Specialist	Austin	0.39	Provide educational materials, training, and end-user support for Cerner solutions for federal client projects
Caley Richardson	Federal Learning Specialist	San Antonio	0.33	Provide educational materials, training, and end-user support for Cerner solutions for federal client projects
Lashante Sherman	Senior Federal Learning Specialist	San Antonio	0.21	Provide educational materials, training, and end-user support for Cerner solutions for federal client projects
Akeem Berry	System Engineer I	Killeen	7.83	Perform daily tasks to verify system integrity and availability, perform ongoing performance tuning, hardware/OS upgrades, and resource optimization, deploy physical and virtual servers, and provide Tier III and other support per request
Jithin Jose	Test Analyst	San Antonio	2.53	Create and assist in the development of manual, automated, and exploratory tests, evaluate testing effectiveness on client-reported defects in conjunction with root cause analysis, and provide improvement feedback in the testing process
JT Thompson	Technical Solution Analyst I	Killeen	1.43	Perform troubleshooting investigations via front-end and back-end methods

# Exhibit B

<b>Company</b>	<b>Serial Number</b>	<b>Product Category Tier 2</b>	<b>Product Category Tier 3</b>	<b>Manufacturer</b>	<b>Product</b>
AHAU_TX-Seton Family of Hospitals	MXQ61905BK	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ61905BF	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ61905BL	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ023033B	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen10
AHAU_TX-Seton Family of Hospitals	MXQ023033D	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen10
AHAU_TX-Seton Family of Hospitals	MXQ023033C	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen10
AHAU_TX-Seton Family of Hospitals	MXQ73807S5	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ73807S8	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ73807S6	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ73807S7	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ73905SV	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ61306G0	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ63908FN	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9

AHAU_TX-Seton Family of Hospitals	MXQ54003N5	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ54003N6	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ63908FM	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ928036N	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen10
AHAU_TX-Seton Family of Hospitals	USE132NBV7	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 G7
AHAU_TX-Seton Family of Hospitals	USE109N295	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 G7
AHAU_TX-Seton Family of Hospitals	USE109N29D	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 G7
AHAU_TX-Seton Family of Hospitals	USE145K72D	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 G7
AHAU_TX-Seton Family of Hospitals	42075032-34A5-FBA6-C712E8EF8A81	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
AHAU_TX-Seton Family of Hospitals	42087C5A-323D-01D7-98986CDFB0AB	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
AHAU_TX-Seton Family of Hospitals	42085000-631B-AD14-C92C93BECDD7	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
AHAU_TX-Seton Family of Hospitals	4207FA66-5B0E-5AC4-E297233703F1	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
AHAU_TX-Seton Family of Hospitals	4208B55E-F1A3-0106-6CD1E156F0E0	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition

AHAU_TX-Seton Family of Hospitals	42083FB8-573C-B9AD-169AE23D9497	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
AHAU_TX-Seton Family of Hospitals	MXQ63902KR	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ63902KL	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ63902KJ	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ63902KM	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ63902KP	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ63902KQ	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ90101YK	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen10
AHAU_TX-Seton Family of Hospitals	MXQ90101YL	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen10
AHAU_TX-Seton Family of Hospitals	MXQ90101YM	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen10
AHAU_TX-Seton Family of Hospitals	MXQ82104KV	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ82104KT	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ82103H5	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	MXQ82103H3	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
AHAU_TX-Seton Family of Hospitals	USE115N0DR	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 G7

GNRL_TX-University Medical Center of El Paso	FJC1925D01Q	Network	Router	Cisco Systems	3925 Series
GNRL_TX-University Medical Center of El Paso	FJC1925D07Q	Network	Router	Cisco Systems	3925 Series
GNRL_TX-University Medical Center of El Paso	FTX1218A428	Network	Router	Cisco Systems	3825 Series
GNRL_TX-University Medical Center of El Paso	MXQ70100MN	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	MXQ70100ML	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	MXQ70100MM	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	MXQ51202L8	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360p Gen8
GNRL_TX-University Medical Center of El Paso	MXQ613057L	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	MXQ74405Y9	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	4208BB01-1C01-ECAD-E689E9BB6E8E	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
GNRL_TX-University Medical Center of El Paso	4208F057-1366-9BDD-6E79DEBE4988	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
GNRL_TX-University Medical Center of El Paso	MXQ51202KN	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360p Gen8
GNRL_TX-University Medical Center of El Paso	MXQ51202KG	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360p Gen8
GNRL_TX-University Medical Center of El Paso	MXQ51202KB	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360p Gen8

GNRL_TX-University Medical Center of El Paso	USE523RLEJ	Server	Physical	Hewlett Packard Enterprise	ProLiant DL160 Gen8
GNRL_TX-University Medical Center of El Paso	MXQ72201HF	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	MXQ72201HC	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	MXQ72201HD	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
GNRL_TX-University Medical Center of El Paso	01-65-0103080192	Network	Power Switch	WTI	RSM-8
GNRL_TX-University Medical Center of El Paso	01-65-0124080346	Network	Power Switch	WTI	RSM-8
GNRL_TX-University Medical Center of El Paso	01-67-0301080266	Network	Power Switch	WTI	IPS-800
GNRL_TX-University Medical Center of El Paso	01-67-0324080472	Network	Power Switch	WTI	IPS-800
GNRL_TX-University Medical Center of El Paso	USE517P62B	Server	Physical	Hewlett Packard Enterprise	ProLiant DL160 Gen8
GWHO_TX-Bosque County Hospital District DBA Goodall-Witcher Hospita	1.65083E+12	Network	Power Switch	WTI	RSM-8
GWHO_TX-Bosque County Hospital District DBA Goodall-Witcher Hospita	FTX1734AH22	Network	Router	Cisco Systems	2911 Series
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ54602SJ	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ5410664	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ5410663	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ816058M	Server	Physical	Hewlett Packard Enterprise	ProLiant DL380 Gen9



MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ816058N	Server	Physical	Hewlett Packard Enterprise	ProLiant DL380 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ7150BKW	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ51600CH	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360p Gen8
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ51600CX	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360p Gen8
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	USB545203G	Storage	Fiber Channel Switch	Brocade Communication Systems	6505
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	422FF8C1-DE27-B6E4-38EA76493071	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	422FA5C6-C3D4-2B63-710CD7234FA7	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ542069S	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ542069P	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ546068G	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	USB545203A	Storage	Fiber Channel Switch	Brocade Communication Systems	6505
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ5400414	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ5400415	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9

MCH_TX-0575-Ector County Hospital District/Medical Center Health System	MXQ61303YC	Server	Physical	Hewlett Packard Enterprise	ProLiant DL360 Gen9
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	FCH2226V6BX	Server	Physical	Cisco Systems	UCS C220 M4
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	FCH1947V127	Server	Physical	Cisco Systems	UCS C220 M4
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	FCH2226V6C4	Server	Physical	Cisco Systems	UCS C220 M4
MCH_TX-0575-Ector County Hospital District/Medical Center Health System	FCH2226V5G2	Server	Physical	Cisco Systems	UCS C220 M4
HHSC_TX-Health and Human Services Commission	422F6E6E-06DF-3A8E-CB1ADFD3E7B5	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
HHSC_TX-Health and Human Services Commission	422F1431-8B5B-D374-AAC5C749CF4F	Network	Load Balancer	F5 Networks	BIG-IP Virtual Edition
HHSC_TX-Health and Human Services Commission	18471926	Server	Physical	Multi-Tech	FaxFinder 840
HHSC_TX-Health and Human Services Commission	18471970	Server	Physical	Multi-Tech	FaxFinder 840
HHSC_TX-Health and Human Services Commission	18471929	Server	Physical	Multi-Tech	FaxFinder 840
HHSC_TX-Health and Human Services Commission	FJC1948D0ZH	Network	Router	Cisco Systems	3945 Series